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*Attorneys for Pacific Seafood Defendants*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

BRAND LITTLE and ROBIN BURNS,  
Individually and on Behalf of All Others  
Similarly Situated,

Plaintiff,

v.

PACIFIC SEAFOOD PROCUREMENT, LLC;  
PACIFIC SEAFOOD PROCESSING, LLC;  
PACIFIC SEAFOOD FLEET, LLC; PACIFIC  
SEAFOOD DISTRIBUTION, LLC; PACIFIC  
SEAFOOD USA, LLC; DULCICH, INC.;  
PACIFIC SEAFOOD – EUREKA, LLC;  
PACIFIC SEAFOOD – CHARLESTON, LLC;  
PACIFIC SEAFOOD – WARRENTON, LLC;  
PACIFIC SEAFOOD – NEWPORT, LLC;  
PACIFIC SEAFOOD – BROOKINGS, LLC;  
PACIFIC SEAFOOD – WESTPORT, LLC;

Case No. 3:23-cv-01098-AGT

**NOTICE OF WITHDRAWAL OF  
DEFENDANTS' REPLY IN SUPPORT  
OF MOTION TO DISMISS AND  
REPLACEMENT WITH CORRECTED  
REPLY (DKT. 229)**

Date: January 24, 2025  
Time: 10:00 a.m.  
Location: Courtroom A, 15th Floor  
Judge: The Honorable Alex G. Tse

PACIFIC SURIMI – NEWPORT, LLC; BLUE  
RIVER SEAFOOD, INC.; SAFE COAST  
SEAFOODS, LLC; SAFE COAST SEAFOODS  
WASHINGTON, LLC; OCEAN GOLD  
SEAFOODS, INC.; NOR-CAL SEAFOOD,  
INC.; KEVIN LEE; AMERICAN SEAFOOD  
EXP, INC.; CALIFORNIA SHELLFISH  
COMPANY, INC.; ROBERT BUGATTO  
ENTERPRISES, INC.; ALASKA ICE  
SEAFOODS, INC.; LONG FISHERIES, INC.  
CAITO FISHERIES, INC.; CAITO  
FISHERIES, LLC; SOUTHWIND FOODS,  
LLC; FISHERMAN’S CATCH, INC.;  
GLOBAL QUALITY FOODS, INC.; GLOBAL  
SEAFOOD LLC; OCEAN KING FISH INC.;  
SOUTH BEND PRODUCTS LLC; SWANES  
SEAFOOD HOLDING COMPANY LLC;  
BORNSTEIN SEAFOODS, INC.; ASTORIA  
PACIFIC SEAFOODS, LLC and DOES 29-60,

Defendants.

1 **PLEASE TAKE NOTICE THAT** undersigned Defendants (“Defendants”) hereby  
 2 withdraw their Reply In Support of Motion to Dismiss filed December 20, 2024 (Dkt. 229), and  
 3 replace it with a Corrected Reply In Support of Motion to Dismiss (the “Corrected Reply”) filed  
 4 concurrently herewith.

5 On December 28, 2024, Plaintiffs’ counsel contacted counsel for defendants and inquired  
 6 “whether Defendants will stipulate to withdrawing their omnibus reply” and replace it by January  
 7 3, 2024, with “a reply that is within the page limits set by the court, i.e. 15 pages.” Following  
 8 conferral with Plaintiffs’ counsel, Defendants agreed to Plaintiffs’ request. Plaintiffs do not  
 9 object to withdrawal of the Reply (Dkt. No. 229), or the filing of the Corrected Reply.

10  
 11 DATED: December 30, 2024

/s/ Charles H. Samel

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25 DATED: December 30, 2024

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DATED: December 30, 2024

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DATED: December 30, 2024

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DATED: December 30, 2024

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1 DATED: December 30, 2024

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7 DATED: December 30, 2024

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14 DATED: December 30, 2024

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25 DATED: December 30, 2024

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DATED: December 30, 2024

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DATED: December 30, 2024

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1 DATED: December 30, 2024

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11 DATED: December 30, 2024

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16 DATED: December 30, 2024

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21 DATED: December 30, 2024

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Kevin Lee*

**ATTESTATION UNDER L.R. 5-1(i)(3)**

Pursuant to Civil Local Rule 5-1(i)(3), I attest under the penalty of perjury that the above signatories authorized the use of an electronic signature and concurred in the filing of this document.

/s/ Charles H. Samel